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July 31, 2020

VIA ECF

Hon. Esther Salas
United States District Judge
U.S. District Court, District of New Jersey
MLK Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street, Room 5076
Newark, New Jersey 07102

Re: Ali Karimi v. Deutsche Bank Aktiengesellschaft, et al.
Case No. 2:20-cv-08978-ES-MAH

Dear Judge Salas:

We represent Deutsche Bank Aktiengesellschaft, John Cryan, Christian Sewing, and James Von Moltke (together, the “Defendants”) in the above-captioned action, and write on behalf of all parties pursuant to this Court’s General Pretrial and Trial Procedures to respectfully propose a schedule for further proceedings in this action.

On July 15, 2022, Plaintiff Ali Karimi commenced the above-captioned action by filing a complaint alleging violations of the Securities Exchange Act of 1934. All Defendants have agreed to accept service of the summons and complaint, while reserving their rights to assert any and all defenses in the matter, including, but not limited to, improper venue and lack of personal jurisdiction.

Recognizing that this action is governed by the procedures and timelines set forth under the Private Securities Litigation Reform Act of 1995 (“PSLRA”) for appointing Lead Plaintiff(s) and Lead Counsel, we have conferred with counsel for Plaintiff Karimi and all parties respectfully request that the Court adjourn without date Defendants’ time to move, answer, or otherwise respond to the complaint and adopt the schedule set forth below in this action (or any future consolidated action in the event that any related complaints are filed):

- Pursuant to 15 U.S.C. § 78u-4(a)(3)(A), motions for appointment as Lead Plaintiff and approval of counsel shall be due on September 14, 2020;

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- Oppositions to motions for appointment as Lead Plaintiff and approval of counsel shall be due on September 28, 2020;
- Replies in further support of motions for appointment as Lead Plaintiff and approval of counsel shall be due on October 5, 2020;
- Lead Plaintiff's Amended Complaint shall be filed within 60 days after the Court's appointment of Lead Plaintiff and Lead Counsel;
- Defendants' deadline to move, answer, or otherwise respond to the Amended Complaint shall be 60 days after the filing of the Amended Complaint;
- Lead Plaintiff's opposition to Defendants' motion to dismiss shall be filed within 60 days after the filing of Defendants' motion to dismiss; and
- Defendants' reply in further support of their motion to dismiss shall be filed within 30 days after the filing of Lead Plaintiff's opposition to the same.

This is the parties' first request for an adjournment.

Respectfully submitted,

s/ Mark C. Errico

Mark C. Errico

MCE:md

cc: All Counsel of Record (via ECF)
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